

EXHIBIT O

Reddy, Srikanth K

From: Reddy, Srikanth K
Sent: Thursday, January 13, 2011 1:26 AM
To: 'KStollDeBell@merchantgould.com'; 'WSchultz@merchantgould.com'; 'Rachel Clark Hughey'; 'echad@merchantgould.com'
Cc: Robertson, Scott L; Albert, Jennifer A; Strapp, Michael; Clements, James D
Subject: RE: ePlus v. Lawson: Witnesses and Exhibits January 13, 2011

Lawson Counsel:

Of the 108 exhibits which Lawson indicated that it intended to use with Dr. Shamos, Dr. Shamos did not cite 91 of those exhibits in his non-infringement report. Accordingly, please confirm that Lawson will not attempt to use the 91 documents listed below with Dr. Shamos during his non-infringement testimony. In the absence of such confirmation, ePlus intends to seek assistance from the Court to prevent Dr. Shamos from testifying about these documents during his non-infringement testimony.

DX-7
DX-61
DX-62
DX-96

DX-102
DX-105
DX-107
DX-117
DX-125
DX-126
DX-133
DX-180

DX-232

DX-233
DX-235
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PX-398
PX-399
PX-407

Regards,

Srikanth

1/13/2011

Srikanth Reddy
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www.goodwinprocter.com

From: Rachel Clark Hughey [mailto:RHughey@merchantgould.com]
Sent: Wednesday, January 12, 2011 8:34 AM
To: Rachel Clark Hughey
Cc: ML-ePlus Goodwin Service; Craig Merritt; Robin Randolph; LawsonService; Carr, Dabney J.
Subject: ePlus v. Lawson: Witnesses and Exhibits January 13, 2011

ePlus trial team,

Pursuant to the parties' agreement to identify witnesses and the exhibits intended to be used with each witness, Lawson intends to put on the following witnesses and use the following exhibits on Thursday January 13, 2011:

Keith Knuth
DX 251

William Yuhasz
DX 202
DX 203
DX 204
DX 205
DX 206
DX 207
DX 209
PX 298
PX 337
PX 338

Keith Lohkamp
DX 71
DX 76
DX 84
DX 85
DX 176
DX 191
DX 335
PX 99
PX 100
PX 101
PX 104

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PX 105
PX 106
PX 108
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PX 113
PX 114
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PX 118
PX 149
PX 187
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PX 211
PX 214
PX 215
PX 226
PX 363
PX 398
PX 402
PX 500A
PX 500AA
PX 500B
PX 500DD
PX 500FF
PX 500GGG
PX 500OO
PX 500S
PX 500X
PX 500XX1
PX 500YY
PX 501AA
PX 501B1
PX 501D1
PX 501G
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PX 501N
PX 501R
PX 501T
PX 515
PX 516

Michael Shamos

DX-1
DX-2
DX-3
DX-7
DX-61

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PX-398

PX-399
PX-407

To the extent that Lawson does not complete the examination of witnesses whose identity and exhibits have been disclosed, Lawson incorporates those witnesses and exhibit disclosures into later lists.

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